

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MULTIMEDIA PLUS, INC. AND
MULTIMEDIA TECHNOLOGIES, LLC,

Plaintiffs and
Counterdefendants,

**PLAINTIFFS' REPLY
TO COUNTERCLAIMS**

-against-

PLAYERLYNC LLC

14 Civ. 08216 (WHP)

Defendant and
Counterclaimant.

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Plaintiffs Multimedia Plus, Inc. and Multimedia Technologies, LLC ("Plaintiffs"), by and through their attorneys, Kane Kessler, P.C., hereby reply to the Counterclaims of Defendant PlayerLync, LLC ("Defendant") as follows:

1. Plaintiffs aver that ¶ 1 consists of a conclusion of law to which no response is required. To the extent that any response is necessary, Plaintiffs deny each and every allegation in ¶ 1.

THE PARTIES

- 2. Admitted.
- 3. Admitted.
- 4. Admitted.

JURISDICTION AND VENUE

5. Plaintiffs aver that ¶ 5 consists of a conclusion of law to which no response is required. To the extent that any response is necessary, Plaintiffs deny each and every allegation in ¶ 5.

6. Plaintiffs aver that ¶ 6 consists of a conclusion of law to which no response is required. To the extent that any response is necessary, Plaintiffs deny each and every allegation in ¶ 6.

7. Plaintiffs aver that ¶ 7 consists of a conclusion of law to which no response is required. To the extent that any response is necessary, Plaintiffs deny each and every allegation in ¶ 7.

8. Plaintiffs aver that ¶ 8 consists of a conclusion of law to which no response is required. To the extent that any response is necessary, Plaintiffs deny each and every allegation in ¶ 8.

REPLY TO FIRST COUNTERCLAIM

9. Plaintiffs repeat and re-allege each and every response to ¶¶ 1-8 of the Counterclaims as if fully set forth herein.

10. Admitted.

11. Admitted.

12. Plaintiffs deny each and every allegation of ¶ 12.

REPLY TO SECOND COUNTERCLAIM

13. Plaintiffs repeat and re-allege each and every response to ¶¶ 1-8 of the Counterclaims as if fully set forth herein.

14. Plaintiffs admit that they claim to own all rights in the '025 patent entitling them to recover for infringement of the '025 patent and deny the remaining allegations of ¶ 14.

15. Admitted.

16. Plaintiffs deny each and every allegation of ¶ 16.

AFFIRMATIVE DEFENSES

Without assuming any burden that they would not otherwise bear, and reserving the right to amend this Reply to assert additional defenses as they may become known during investigation and discovery, Plaintiffs assert the following affirmative defenses.

FIRST AFFIRMATIVE DEFENSE

17. The Counterclaims fail to state a cause of action against Plaintiffs for which relief can be granted.

RESERVATION OF RIGHT TO AMEND

Plaintiffs reserve the right to amend and/or supplement its Reply to assert any and all pertinent defenses ascertained through further investigation and discovery of this action.

REQUEST FOR RELIEF

WHEREFORE, Plaintiffs/Counterdefendants Multimedia Plus, Inc. and Multimedia Technologies, LLC respectfully pray that the Court determine and adjudge:

1. that the Counterclaims be dismissed on the merits;
2. that Defendant/Counterclaimant take nothing by the Counterclaim;
3. that Plaintiffs be awarded its costs, disbursements, attorneys' fees, and expenses incurred herein; and
4. that Plaintiffs be awarded such other and further relief as the Court may deem proper.

Dated: New York, New York
April 20, 2015

KANE KESSLER, P.C.

By: 

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